NPDES FORM 6100-28	EPA	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460 ANNUAL REPORT FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT	FORM Approved OMB No. 2040-0004

Permit Information

Report Year: 2020

Reporting Period: 1/1/2020 to 12/31/2020

NPDES ID: MAR053458

Facility Information

Facility Name: SCHNITZER NORTHEAST

Facility Point of Contact

First Name Middle Initial Last Name: Keri Fitzpatrick

Phone: 781-706-7003 **Ext.:**

Email: kfitzpatrick@schn.com

Facility Mailing Address

Address Line 1: 20 NIPPNAPP TRAIL

Address Line 2: PO BOX 19726 **City:** WORCESTER

ZIP/Postal Code: 01607 **State:** MA

County or Similar Division: Worcester

General Findings

Provide a summary of your past year's routine facility inspection documentation (see Part 3.1.2 of the permit). In addition, if you are an operator of an airport facility (Sector S) that is subject to the airport effluent limitations guidelines, and are complying with the MSGP Part 8.S.8.1 effluent limitation through the use of non-urea-containing deicers, provide a statement certifying that you do not use pavement deicers containing urea (e.g., "Urea was not used at [name of airport] for pavement deicing in the past year and will also not be used in 2015." (Note: Operators of airport facilities that are complying with Part 8.S.8.1 by meeting the numeric effluent limitation for ammonia do not need to include this statement.)

Facility inspections were completed during wet and dry weather conditions. Inspections generally identified housekeeping de ficiencies including sweeping, removal of accumulated solids, inlet (haybale) management, solid waste management, outdoor pe troleum storage, removal of speedi-dry and leaking equipment.

Provide a summary of your past year's quarterly visual assessment documentation (see Part 3.2.2 of the permit).

During one or more of the quarterly sampling events the stormwater sample collected was reported to contain a light yellow c olor, a light brown color, suspended solids, settled solids, and/or sulfur odor.

For any four-sample (minimum) average benchmark monitoring exceedance, if after reviewing the selection, design, installation, and implementation of your control measures and considering whether any modifications are necessary to meet the effluent limits in the permit, you determine that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice, provide your rationale for why you believe no further reductions are achievable (see Part 6.2.1.2 of the permit). Enter "NA" if not applicable.

NA

Provide a summary of your past year's corrective action documentation (See Part 4.4 of the permit). (Note: If corrective action is not yet completed at the time of submission of this annual report, you must describe the status of any outstanding corrective action(s).) Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that you are in compliance with the permit.

In 2020, the average concentrations of copper, iron and zinc were detected at concentrations greater than the benchmark conc entration. The average concentration of copper was 0.0210 mg/L compared to a benchmark concentration of 0.0123 mg/L. The a verage concentration of iron was 3.63 mg/L compared to a benchmark concentration of 1 mg/L. The average concentration of z inc was 0.158 mg/L compared to a benchmark concentration of 0.11 mg/L. The average concentration of copper in 2020 was gene rally consistent or better than historical years. The average concentration of iron was consistent with historical years. T he average concentration of zinc exceeded the benchmark concentration in 2018 and 2020, however the average concentration wa s consistent during those years and are only slightly above the benchmark concentration.

Corrective actions in 2020 included sweeping frequency, removal of solid waste, removal of accumulated solids, replacement o f inlet (haybale) protection, repair of mobile equipment, removal of used speedi-dry and covered outdoor petroleum storage. In August 2019, an approximate 33,000 square feet operating area was removed and replaced with a new concrete operating surf ace. The operating surface was in poor condition and impeded sweeping efficiency. The new operating surface allows for mor e effective sweeping and improved scrap metal inventory management. Historical analytical data and owner/operator knowledge demonstrates that housekeeping and inventory levels contribute to stormwater quality. Sweeping was performed regularly and inventory was routinely managed and shipped off-site. However, market conditions generated an above average volume of scrap metal which likely contributed to the stagnant stormwater quality. The housekeeping (i.e. sweeping) is consistently adjuste d based on inventory levels and weather conditions to achieve the highest stormwater quality. This is an iterative process that will continue to be ongoing in 2021.

Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Certified By: Keri A. Beck

Certifier Title:

Certifier Email: kfitzpatrick@schn.com

Certified On: 01/28/2021 5:34 PM ET